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Attorneys for
Michael Lamberts and Martha Lamberts

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

&

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088
Chapter 11
(Lead Case)

**DECLARATION OF NO RESPONSE TO
MOTION FOR ORDER AUTHORIZING
WITHDRAWAL OF COUNSEL**

I, Michael S. Danko, declare as follows:

1. I am an attorney duly admitted to practice before all courts of the State of California, including the Northern District.

2. I am an attorney with Danko Meredith ("firm"), attorney of record for Bankruptcy

1 3. I am informed and believe that facts set forth in this Declaration are true of my
2 personal knowledge, and if called upon to do so I could and would competently testify to these
3 facts.

4 4. On November 2, 2020, the firm filed a Notice of Motion and Motion for Order
5 Authorizing Withdrawal of Counsel (Docket No. 9387).

6 5. On November 2, 2020, the firm served a copy of Notice of Motion and Motion
7 for Order Authorizing Withdrawal of Counsel on required parties using the methods of service
8 identified on the Certificate of Service.

9 6. On November 2, 2020, the firm filed the Certificate of Service (Docket No.
10 9388).

11 7. Pursuant to Bankruptcy Local Rule 9014-1(3)(A), the notice of motion provides
12 that the deadline to file and served a written response for hearing is 21 days after the date of
13 service of the motion.

14 8. More than 21 days have passed after service of the notice of motion.

15 9. The firm checked the docket for this bankruptcy case and/or adversary
16 proceedings and no response or request for hearing was timely filed.

17 10. No response or request for hearing was timely served on the firm via Notice of
18 Electronic filing or at the street address, mail address, or facsimile number specified on the
19 notice of motion.

20 11. Based on the foregoing and pursuant to Bankruptcy Local Rule 9014-1(3)(A), a
21 hearing has not been requested and is not required.

22 12. We request that the court grant the motion and enter an order without a hearing.
23

24 I declare under penalty of perjury in accordance with the laws of the State of California
25 that the foregoing is true and correct. Executed on November 24, 2020 at Redwood Shores,
26 California.

27
28 
Michael S. Danko